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October 24, 2024

Via ECF

The Honorable Judith C. McCarthy
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

MEMO ENDORSED

Re: United States v. Justine Ying
Case No.: 7:22-mj-03841-UA-4

Dear Judge McCarthy:

The undersigned has been appointed to represent Ms. Justine Ying in the above-captioned matter. The defendant, Justine Ying, respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of her release. Ms. Ying seeks an Order of the Court to permit her to hold but not authorize or use a credit card issued to her as a result of an application for credit made by Ms. Ying's brother. Unbeknownst to Ms. Ying, her brother added her to his application for a credit card. Her brother assumed his application would be approved with fewer issues. He further assumed a secondary card would be issued to Ms. Ying and he would benefit from the extra frequent flyer miles.

Undersigned counsel conferred with Assistant United States Attorney Steven Kochevar, who has indicated that the government does not object to Ms. Ying having the card but not using it. Undersigned's office communicated with supervising United States Probation Officer Nelson Valenzuela. Officer Valenzuela stated, "[T]here is no need for [Ms. Ying] to hold a credit card she will not use. [He] would rather she is removed from the credit card completely."

WHEREFORE, the defendant moves that the Court issue an Order of the Court permitting the defendant to hold but not authorize or use the credit card.

RESPECTFULLY SUBMITTED,

/s/ *Bruce D. Koffsky*

BDK/dgb
cc: Government

Application is GRANTED.

SO ORDERED.

Hon. Victoria Reznik, U.S.M.J.

Dated: October 24, 2024